

**Economic Roundtable
Institutional Review
Board (IRB)**

Request for IRB Approval
Must be completed for all projects
involving human subjects

244 S. San Pedro, #506
Los Angeles, CA 90015
Phone: 213-892-8104

Follow the format shown below to provide requested information

TITLE	<i>Grocery Industry Equity Analysis</i>
PRINCIPAL INVESTIGATOR	<i>Daniel Flaming, President, Economic Roundtable</i>
FUNDING	<i>UFCW Locals 7, 21, 324, 367, 770</i>
LEVEL OF REVIEW	<p>Indicate the level of IRB review you are requesting for this project:</p> <p><input type="checkbox"/> Level I: Exempt Research and Review (no foreseeable risk)</p> <p><input checked="" type="checkbox"/> Level II: Expedited Research and Review (minimal risk)</p> <p><input type="checkbox"/> Level III: Research and Full Board Review (more than minimal risk or protected subjects)</p> <p>The expedited review procedure may not be used where identification of the subjects and/or their responses would reasonably place them at risk of criminal or civil liability or be damaging to the subject's financial standing, employability, insurability, reputation, or be stigmatizing, unless reasonable and appropriate protections will be implemented so that risks related to invasion of privacy and breach of confidentiality are no greater than minimal.</p>
SCOPE OF WORK	<p>Layout the project tasks, detailing work processes for this project:</p> <p><i>The project team covered by this research protocol includes Economic Roundtable staff and a consultant, Professor Peter Dreier of Occidental College.</i></p> <p><i>Purpose of Study:</i></p> <p><i>Investigate economic outcomes for 40,510 Kroger workers represented by the UFCW in the regions of California, Colorado and Washington that are covered by the five sponsoring locals. The project includes analysis of secondary data from the U.S. Census Bureau (no risk to human subjects), as well as analysis of union membership records and a questionnaire survey of workers (minimal risk to human subjects). The analysis of person-level membership records and the questionnaire survey of workers are the reasons for this Request for IRB Approval.</i></p> <p><i>Study Population:</i></p> <p><i>Approximately 40,510 workers currently employed at the Kroger grocery stores.</i></p> <p><i>Steps that will be carried out with human subjects in this project are as follows:</i></p> <p>Analyze Membership Records</p> <p><i>Analyze UFCW membership records to obtain all possible information directly available from those records. This includes age, gender, ethnicity, place of residence, place of employment, job title, wage level, work schedule, and length of job tenure.</i></p>

Conduct Survey of Kroger Workers

Conduct an in-depth internet survey of approximately 40,510 workers at Kroger grocery stores. Workers will decide whether to provide informed consent before beginning the survey and will have the option of declining to take the survey. The survey will be conducted by the research team in English and Spanish using an online internet survey platform. The UFCW locals will support worker engagement with the survey through outreach to and communication with represented workers. The steps for designing and conducting the survey are:

Focus group

Conduct focus group with multiple small group of workers convened by the UFCW locals to learn about the experiences, living conditions and concerns of workers that should be addressed through the survey.

Develop survey questions

Develop a set of survey questions about demographic attributes, household composition, employment conditions, workplace safety, housing, homelessness, food security, social safety net benefits, and transportation. Survey questions will be in English and Spanish.

Define survey universe and sampling frame

Using member records data provided by the five UFCW locals, define the survey universe and create a sampling framework. Data from membership records about gender, age, job classification, wage level, place of employment, and job tenure will be used to establish benchmarks for a representative sample of respondents.

Develop and set up website and online survey

Design an online survey using the Google Forms platform with secure, password-protected data collection. The survey will be available in English and Spanish.

Conduct a pretest of the survey

Work with the UFCW locals to pretest the online survey with a small sample of workers. Revise questions and website as necessary.

Survey data collection

Work with the five UFCW locals to facilitate survey collection. This will include real time data tracking, maintaining the website, and working with UFCW staff to increase survey participation.

Monitor survey responses

Monitor the number and representativeness of survey responses throughout survey collection.

Analyze Survey Data

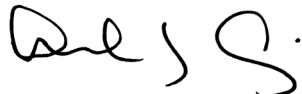
Analyze data collected using statistical software. Identify key findings within and across worker groups.

RISK LEVEL	<p>Identify the level of risk that this project will create for human subjects as defined in Section VI of the Economic Roundtable policy on protection of human subjects:</p> <p><input type="checkbox"/> Less than minimal risk</p> <p><input checked="" type="checkbox"/> Minimal Risk</p> <p><input type="checkbox"/> Greater than minimal risk but with direct benefit to subjects</p> <p><input type="checkbox"/> Greater than minimal risk but no direct benefit to subjects</p> <p>Briefly summarize the facts that support the risk level you have identified. If the study involves greater than minimal risk, identify all direct benefits to the human subjects as well as any additional safeguards.</p> <p><i>This is a Level II project, research with minimal risk involving human subjects. No direct benefits are likely to accrue to human subjects, although Kroger workers (regardless of whether they participate in the survey) may receive an indirect benefit if the research supports a successful campaign by the UFCW locals to improve working conditions and compensation.</i></p> <p><i>The Economic Roundtable team will analyze UFCW membership records to extract information about workers' age, gender, ethnicity, place of residence, job description, wage level, work schedule, and length of job tenure. The team will only report aggregated, descriptive statistics about workers and not reveal any personal identifying information.</i></p> <p><i>The Economic Roundtable team survey Kroger workers who are members of the five UFCW locals via an online questionnaire in English and Spanish. Aside from the focus group sessions and some field testing with UFCW staff and shop stewards, the research team will have no personal contact with survey respondents. UFCW staff plan to support their members' participation in the survey, offering assistance in completing them on workers cell phones, and by sending text and email reminders complete it. The Economic Roundtable team will provide periodic updates to the UFCW locals about the response rate during the survey process.</i></p> <p><i>It is recommended that the IRB review this research project as "Level II" because there is minimal risk to the human subjects. Survey responses collected from workers will be safeguarded in the Economic Roundtable office, and will not be shared with any outside organizations, except in de-identified and aggregated form.</i></p> <p><i>The remainder of this study poses no greater than minimal risk to human subjects, because the analysis uses publicly-available data from the U.S. Census Bureau and other non-confidential, secondary sources. The final report and briefings will present only de-identified data, which are aggregated into summary charts and tables.</i></p>
HEALTH INFORMATION	<p>Identifiable Health Information:</p> <p>(1) Do you need to access or use patient/subject identifiable health information (e.g. medical records, mental health information, lab reports, x-rays, tissue samples) for this research study? NO</p> <p>If yes, go to question (2).</p> <p>If no, you do not need to satisfy HIPAA education requirement.</p>

	<p>(2) Have all investigators and individuals authorized to obtain identifiable health information in this study completed an education program regarding federal (HIPAA) and state privacy requirements?</p> <p>If yes, Please provide certificates of completion and go to question (3).</p> <p>If no, Your study will not be reviewed until all of the requested information has been provided and your application may be returned to you for completion.</p> <p>(3) Describe the specific procedures and safeguards that will be used to de-identify health information of human subjects in this project</p> <p><i>(Not applicable.)</i></p>
<p>INFORMED CONSENT</p>	<p>Indicate the type of informed consent that will be utilized in the study. If a waiver of written informed consent is requested a script of the proposed verbal informed consent should be provided. If a waiver of informed consent is requested please make certain the protocol detail justifies this request.</p> <p><i>A written informed consent will proceed the questions in the online survey, drawn from the U.S. National Institute of Health (NIH), as well as a template from UMass Amherst specifically designed for online surveys. These informed consent documents assume "minimal risk," and are fairly short. The version we plan to use is as follows:</i></p> <p>"INFORMED CONSENT:</p> <p><i>"You are invited to participate in a research survey of grocery stores owned by the Kroger Company. The survey is being done by the Economic Roundtable.</i></p> <p><i>"The purpose of this research study is provide clear and accurate information about the economic condition of Kroger workers.</i></p> <p><i>"If you agree to take part in this study, you will be asked to complete this online survey. This survey will ask about the work you do, your family, your housing, and your ability to pay for basic costs. The survey will take approximately 15 to 30 minutes to complete.</i></p> <p><i>"To the best of our ability your answers in this survey will remain confidential. We will minimize any risks by preserving the anonymity of your response and storing data on a secure computer. No one who is not part of the Economic Roundtable research team will ever be allowed to see the survey records. After the research project is completed, all survey records will be destroyed.</i></p> <p><i>"If you have questions about this survey or if you have a research-related problem, you may contact Dr. Daniel Flaming, who is president of the Economic Roundtable at 213-892-8104 or danflaming@economicrt.org.</i></p> <p><i>"By clicking "I agree" below you are indicating that you are at least 18 years old, have read this consent form and agree to participate in this survey. You are free to skip any question that you choose.</i></p> <ul style="list-style-type: none"> <input type="radio"/> I Agree <input type="radio"/> I Do Not Agree" <p><i>The Economic Roundtable team will collect and store your consent to</i></p>

	<p><i>participate in the survey in the same database as your responses to this survey, which takes approximately 20 minutes to complete.</i></p>
<p>LOCATION</p>	<p>Indicate the location where the human subjects involvement will occur.</p> <p><i>In-person and video contact with survey participants will take place in focus groups and questionnaire pretesting in meeting spaces or video meetings arranged by the five UCFW locals.</i></p> <p><i>All confidential data for project participants will be kept at the Economic Roundtable office:</i></p> <p style="padding-left: 40px;"><i>Economic Roundtable 244 S. San Pedro Street, Suite 506 Los Angeles, California 90012</i></p> <p><i>No confidential data will leave these offices. All data will be managed in conformance with ERT's data security policy.</i></p>
	<p>Carefully indicate the characteristics of the human subjects who will be involved in the project. When special populations are included or when some or all of the subjects are likely to be vulnerable to coercion or undue influence, indicated what additional safeguards have been included in the study to protect the rights and welfare of these subjects.</p> <p><i>The population to be studied is approximately 40,510 workers employed at approximately 414 Kroger grocery stores. The population includes all Kroger employees represented by the five UCFW locals. These workers tend to be paid low-wages and some have limited education and English ability; we will learn other characteristics about them through the research.</i></p> <p><i>Data obtained about these individuals will include:</i></p> <ul style="list-style-type: none"> • <i>Economic Conditions (Rent burden, household overcrowding, experiences of homelessness and food insufficiency, reliance on food stamps)</i> • <i>Economic Inequality (workers compared to Kroger managers, executives and board members)</i> • <i>Community Impacts (food deserts that result from Kroger's decisions about store locations)</i> • <i>Profile of Workers (demographics, family size and age, occupation, wage and benefit levels, work schedules and hours, secondary jobs, length of employment)</i> • <i>Assessment of Job (workplace safety, pride in work, fair and unbiased treatment and advancement, respect, sexual harassment, adequate and stable work hours)</i> <p><i>Disclosure of information assembled for this study could cause embarrassment and workplace reprisal from the employer and/or work supervisors. It is also possible that the public release of identified survey responses could negatively affect participants' ability to find future employment. Safeguards that will be used to protect this potentially vulnerable population include:</i></p>

	<i>The research team will follow all procedures set forth in the Economic Roundtable's Confidential Data Management Policy and Policy on the Protection of Human Subjects, and this Request for IRB approval to ensure that no information that can be linked to specific individuals is seen by anyone other than authorized members of the research team.</i>
REPORTING AND MONITORING	<p>Describe the protocols that will be followed for reporting back to the Institutional Review Board and monitoring data security.</p> <p><i>The research team will follow all of the procedures set forth in the Economic Roundtable's Confidential Data Management Policy as well as in agreements with organizations providing confidential data.</i></p> <p><i>Any study-related events that endanger human subjects or adverse data security events will be promptly reported to the IRB as well as any other organizations whose data is affected.</i></p> <p><i>Reports on protection of human subjects, data security and project design will be submitted to the IRB semi-annually or more often if requested.</i></p>
ATTACHMENTS	<p><i>The following additional documentation supports this request for IRB approval:</i></p> <ol style="list-style-type: none"> <i>1) Transmittal letter.</i> <i>2) Copy of the funding agreement with the five UFCW locals, including the scope of work. The agreement was signed in part with multiple signature pages. The approved agreement is attached.</i> <p><i>NIH certificates of completion for the principal investigator and research staff are posted on the IRB web site: http://www.economicrt.org/irb/</i></p>



Signature of Principal Investigator

Daniel Flaming

Print Name of Principal Investigator

June 11, 2021

Date of Signature

President

Title